

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL  
FOR DEFENDANTS**

Counsel for the Defendants in this action hereby moves this Court for leave to withdraw, based upon the following:

1. This action has been actively litigated for approximately 6 months now by the Defendants.
2. To date, the Defendants have not met their obligations to the undersigned counsel regarding payment for legal services rendered and costs incurred.
3. Numerous requests to address the issue have been made to the clients, to no avail.
4. Defendants Christine O'Donnell and Friends of Christine O'Connell have indicated that they have no objection to counsel's withdrawal. Mr. Marston has not responded.
5. Based upon the current case schedule and litigation posture, withdrawal as counsel at this stage should not cause any prejudice to the parties. The next 2 deadlines on the Case Schedule are: 1) Interim Status Report due January 5, 2016; and 2) Document Production due January 8, 2016.

6. The clients have been advised that new local, Delaware counsel will need to be retained for at least the single entity Defendant, and that it would be advisable that counsel be obtained for the individual Defendants as well.

7. Counsel for the Plaintiffs has authorized the undersigned counsel to indicate that the FEC does not object to this Motion as long as the procedures of Local Rule 83.7 have been followed and the Defendants have been served with notice at least 14 days before this Motion is presented.

8. Pursuant to Local Rule 83.7, the undersigned counsel is forwarding notice of this Motion via Certified Mail to the Defendants at their last known addresses, as indicated in the attached Certificate of Service. In addition, the Local Rule requires 14 day advance notice be provided before this Motion is "presented," and therefore the undersigned counsel respectfully requests that the Court not consider this Motion until October 29, 2015.

9. If the Motion is granted, then the undersigned counsel will advise the clients in writing and provide information regarding any deadline the Court imposes for the entry of appearance of new counsel.

WHEREFORE, the undersigned counsel for the Defendants respectfully requests that this Court enter an Order in accordance with the form attached, granting him leave to withdraw as counsel in this action.

ABBOTT LAW FIRM



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Dated: October 14, 2015